

LAW OFFICE OF ANDRE L. KYDALA  
54 OLD HIGHWAY 22  
P.O. BOX 5537  
CLINTON, NJ 08809  
(908) 735-2616  
ATTORNEY FOR DEBTOR

IN THE MATTER OF:

Raphael Gardee

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

CHAPTER 7

CASE NO: 20-13167

Certification in Response to Trustee Motion

I, Raphael Gardee, hereby certify and state:

- 1) I am an the Debtor herein.
- 2) I personally filed bankruptcy along with my corporation Gardee Group LLC . The filing was due to the failure of several businesses due to losses in my businesses caused by the activities of my business partners including my children's mother (Genya Daukshta) and my brother.
- 3) My health has been an issue for the last few years. After I signed the petitions Chapter 7 I flew to Medellin Columbia in order to have a biopsy a possible cancerous lump and have surgery to repair a Hernia. I had been without health insurance since 2017 and the only way I could afford medical treatment was to go to Dr Luz Nararyo in Medellin Columbia. Attached hereto as Exhibit A is a copy of one of the forms I was given for my laparoscopic surgery in February of 2020. The cost for the flight, staying at a motel for 4 days and the surgery was less than \$1500.00.
- 4) Shortly after I returned I started having complications. I had pain in my groin area so I needed to go back to the doctor but due to Covid I could not get back to Medellin

Columbia. During this time I was trying to start a new business so that I could have income to live on and pay an accountant to put together business records.

- 5) Due to my health and the Covid epidemic that business closed. My cell phone was turned off and I am not able to pay a mortgage or car payment. I am living day to day either waiting for the trustee to sell my properties and ask me to get out which I will do when asked. Or have the properties sold at sheriff sale. I have not paid my car loan for at least 12 months and expect that to be repossessed at any time. Genya Daukshta has left the state and taken my children to Florida and I did not have the funds to hire an attorney to prevent her taking my children out of state. Additionally I discovered that the accountant I was trying to get to do work for me was not leaving his home due to Covid. (See Exhibit B)
- 6) I finally was able to go back to the doctor in November 2020 (See Exhibit C) As I understand it the mesh used to repair the hernia did not move but I have other medical issues causing the pain for which I do not have sufficient money to have treated.
- 7) I fully anticipate that at the end of my bankruptcy I will either be living with friends or homeless.
- 8) The only way I can pay my creditors is through a liquidation of all my business interests and non-exempt personal property. I truly believe that there will be several hundred thousand dollars after my assets are sold by the trustee. The Gardee Group Owns 1600 River Rd which I believe is valued at \$600,000.00, and has a lien of \$170,000.00; 1822 North Olden Ave which I believe is valued at \$700,000.00 and has a lien of \$500,000.00; 925 Lincoln Highway which I believe is valued at \$825,000.00 and has a lien of \$500,000.00. and finally my home at 161 Pleasantville Rd which I believe has a value of \$700,000.00 and has a lien of \$400,000.00; and finally 36 Wilford Ave which has a value of \$320,000.00 and a lien of \$80,000.00

I hereby certify that the foregoing statements made by me are true and that if they are willfully false I am

subject to punishment.

/s/ Raphael Gardee

(CONSENTIMIENTO INFORMADO)  
PARA HERNIORRAFIA INGUINAL POR  
LAPAROSCOPIA

FECHA 02/febre/2020

NOMBRE RAPHAEL GARDEE

CC G05656418205682

Por medio de la presente **DECLARO** que he sido debidamente informado por el Dr. Juan Pablo Gómez Vélez cirujano laparoscopista en relación a la cirugía : hernia inguinal por vía laparoscópica.

He comprendido y entendido que la cirugía consiste en corregir el defecto de la pared muscular en la región inguinal con una malla de polipropileno la cual podrá ser fijada o no , según los hallazgos quirúrgicos .

La Cirugía Laparoscópica es un medio por el cual se realiza la hernioplastia inguinal y por tanto puede ser convertida a la cirugía convencional o abierta, según hallazgos quirúrgicos.

He comprendido y entendido que todo tipo de procedimiento quirúrgico implica riesgos, complicaciones y secuelas, que tienen diversos grados de severidad como:

1. Recurrencia herniaria.
2. Dolor crónico
3. Lesiones vasculares de pared abdominal, de órganos intra-abdominales y grandes vasos
4. Reacción a cuerpo extraño
5. Sangrado.
6. Infección.
7. Perforación intestinal.
8. Lesión de órganos sólidos.
9. Lesiones térmicas de pared abdominal y órganos intra-abdominales por los aparatos de electrocauterio útiles en la hemostasia quirúrgica.
10. Trombosis venosa periférica (coágulos en venas de las piernas y brazos) y/o venas del abdomen como la vena porta o mesentérica
11. Embolismo pulmonar
12. Neumonía

En caso de presentarse las cuales modifican la evolución postoperatoria de mi padecimiento incrementando la morbilidad, para lo cual puedo requerir de tratamiento médico o quirúrgico adicional.

Tengo entendido que estos riesgos y complicaciones se presentan en diversos porcentajes que van desde el 0,2 al 10 % de los casos y se ven influenciados por las características anatómicas de mi persona, así como de las enfermedades concomitantes que pudiera tener al momento de mi cirugía, sin embargo me han explicado en un lenguaje claro y sencillo, que todo lo anterior se toma en consideración para prever y disminuir hasta donde sea posible las complicaciones que eventualmente se pueden presentar.

A



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assistance as you were  
controller and it is very  
for me. You can receive  
payment daily and will  
really help me get moving  
with my life. Thanks  
much  
Rafi

Thu, Nov 12, 3:05 PM

**Rafi**

**I won't be able to do it. My  
wife won't let me go anywhere  
because of the coronavirus.**

**Sorry**

'B'

## English Speaking Doctor

CUENTA DE COBRO #	000734
NOMBRE	RAPHAEL SEBASTIAN GARDEE
PASAPORTE	561254628
DIRECCION	CALLE 40 74-38
CONCEPTO	CONSULTA
VALOR	110.000 COP

DR. LUZ MARA RANIO  
BILINGUAL MEDICAL DOCTOR  
Reg. 05-0954-08  
UPB

© 1994  
Series 11

Trial	No feedback (%)	Feedback (%)
1	55	65
2	60	75
3	65	80
4	70	85
5	75	90
6	80	92
7	82	94
8	84	95
9	85	95
10	85	95

1. **Consultorio 2401**  
 2. **Servicios, 24th Floor**  
 3. **Edificio, Medellín**

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26



Fecha y hora de impresión: 17/11/2020 2:47 PM

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### Ayuda Diagnóstica

Fecha y hora de Elaboración: 17/11/2020 - 02:46:42 PM  
Identificación: 561264628  
Paciente: RAPHAEL GARDEE  
Fecha de nacimiento: 10/05/1968  
Edad: 52  
Género: Masculino  
Teléfono: 2158179898  
Diagnóstico: M542  
Entidad: Particular

Orden de exámenes:

Número: 2734

Código	Descripción	Observación
881611	ECOGRAFIA TESTICULAR CON ANALISIS DOPPLER	

#### Observación General:

DOLOR EN TESTICULO IZO DE 2 AÑOS DE EVOLUCION

Profesional que realizó la Ayuda Dx:

**LUZ NARANJO**  
Médico General  
2020-11-17 06:06  
UAG

Luz Naranjo Aristizabal  
CC: 48268963 - RM: 595406  
MEDICINA GENERAL